



4. The Defendant EQUIFAX INFORMATION SERVICES, LLC, ("EQUIFAX") is a corporate entity licensed to do business in the State of Nevada.

5. Equifax is a consumer reporting agency, as defined in § 1681(f) of the FCRA, regularly engaged in the business of assembling, evaluating, and dispersing information concerning consumers for the purpose of furnishing consumer reports, as defined in § 1681a(d) of the FCRA, to third parties.

## FACTUAL ALLEGATIONS

6. Plaintiff's creditworthiness has been repeatedly compromised by the acts, obduracy and general indifference of the Defendant.

7. The collection account underlying this action was wrongfully assigned.

8. On December 18, 2006, the furnisher (Sentry) itself contacted Defendant requesting deletion (Exhibit 1).

9. On December 20, 2006, Plaintiff also contacted Defendant requesting deletion.

10. Plaintiff also contacted Defendant on January 10, 2007, again requesting deletion (Exhibit 2).

11. Plaintiff sent Exhibit 1 together with Exhibit 2.

12. On January 23, 2007, Defendant "verified" the Sentry collection account (Exhibit 3).

## STATEMENT OF CLAIM AS AGAINST DEFENDANT

13. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

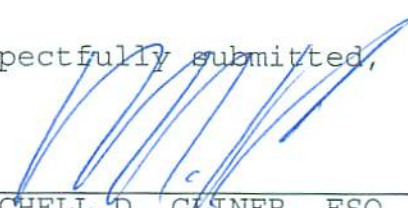
- 1 a. By willfully and/or negligently failing, in the  
2 preparation of the consumer reports concerning  
3 Plaintiff, to follow reasonable procedures to assure  
4 maximum possible accuracy of the information in the  
5 reports.  
6 b. By willfully and/or negligently failing to comport  
7 with FCRA § 1681i.

8  
9 PRAYER FOR RELIEF

10 THEREFORE, Plaintiff prays that the court grant the following  
11 relief as against Defendant:

- 12 a. actual damages;  
13 b. punitive damages;  
14 c. attorney's fees; and  
15 d. costs.

16 Respectfully submitted,  
17  
18

19   
20 MITCHELL D. GLINER, ESQ.  
21 Nevada Bar #3419  
22 3017 West Charleston Boulevard  
23 Suite 95  
24 Las Vegas, Nevada 89102  
25 Attorney for Plaintiff  
26  
27  
28

## Sentry Recovery and Collections

3080 S. Durango Dr.  
Suite 203  
Las Vegas, NV 89117  
Phone: 702.944.4111  
Fax: 702.933.4048

From: Ron Allen

Date Sent: 12-18-06

NAME STEVEN SCHWARTZ

ACCOUNT # 289463-1

CREDITOR DESERT CARDIOLOGIST

SOCIAL # 6722 ^

WE ARE REQUESTING THE ABOVE ACCOUNT BE DELETED FROM EQUIFAX,  
EXPERIAN AND TRANS UNION, IT WAS PLACED IN ERROR\*\*\*\*\*

  
R ALLEN

702-944-4131

This facsimile may contain privileged and confidential information intended only for the use of the individual or entity to which it is addressed. If the reader of the facsimile is not the intended recipient or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and return the original facsimile to the above address via the postal service.

EXHIBIT 1

Steve D. Schwartz  
2499 Silver Beach Drive  
Henderson, Nevada 89052

January 10, 2007

Equifax  
P.O. Box 740241  
Atlanta, GA 30374

Re: Sentry Recovery #28946301.

Dear Sir or Madam:

In regards to your communication, dated January 3, 2007, which asked for additional information regarding the above referenced item, Sentry Recovery #28946301, please find enclosed a copy of a letter from Sentry Recovery to your agency requesting that the item in question be removed since it was placed in error, dated 12-18-06.

Please review my credit report, make sure that this item has been removed and send me a new credit report which verifies that the derogatory item is no longer listed on my report.

My social security number is: -6722. My date of birth is: 07/23/1947.

If you have any questions, my phone number is -3202, my email is:  
@cox.net.

Sincerely,

Steven D. Schwartz

EXHIBIT 2

P.O. Box 105518  
Atlanta, GA 30348

January 23, 2007

**EQUIFAX**



To Start An Investigation, Please Visit Us At  
[www.investigate.equifax.com](http://www.investigate.equifax.com)

014390

000574959-14390

Steve Schwartz  
2499 Silver Beach Dr  
Henderson, NV 89052-2620

Dear Steve Schwartz:

Below are the results of your request for Equifax to reinvestigate certain elements of your Equifax credit file. Equifax contacted each source directly and our investigation is now completed. If you have any additional questions or concerns, please contact the source of that information directly.

**Results Of Your Investigation** (For your security, the last 4 digits of your credit account number(s) have been replaced by \*)

>>> **We have researched the collection account. Account # - 28946301 The results are:** Equifax verified that this item belongs to you. Additional information has been provided from the original source regarding this item. If you have additional questions about this item please contact: **Sentry Recovery And Collec, 3090 S Durango Dr Ste 100, Las Vegas, NV 89117-9192 Phone: (702) 946-1140**

If you have any additional questions regarding the information provided to Equifax by the source of any information, please contact the source of that information directly. You may contact Equifax regarding the specific information contained in this letter within the next 60 days by visiting us at [www.investigate.equifax.com](http://www.investigate.equifax.com).

Thank you for giving Equifax the opportunity to serve you.

#### **Notice to Consumers**

Upon receipt of your dispute, we first review and consider the relevant information you have submitted regarding the nature of your dispute. If the review does not resolve your dispute and further investigation is required, notification of your dispute, including the relevant information you submitted, is provided to the source that furnished the disputed information. The source reviews the information provided, conducts an investigation with respect to the disputed information and reports the results back to us. The credit reporting agency then makes deletions or changes to your credit file as appropriate based on the results of the reinvestigation. The name, address and, if reasonably available, the telephone number of the furnisher(s) of the information contacted while processing your dispute(s) is shown under the "Results of Your Investigation" section on the cover letter that accompanies the copy of your revised credit file.

If you still disagree with an item after it has been verified, you may send to us a brief statement, not to exceed one hundred words (two hundred words for Maine residents), explaining the nature of your dispute. Your statement will become part of your credit file and will be disclosed each time that your credit file is accessed.

If the reinvestigation results in a change to or deletion of the information you are concerned about, or you submit a statement in accordance with the preceding paragraph, you have the right to request that we send your revised credit file to any company that received your credit file in the past six months (twelve months for California, Colorado, Maryland, New Jersey and New York residents) for any purpose or in the past two years for employment purposes.

**EXHIBIT 3**